IAN M. BRYSON, ESQUIRE 1 Pennsylvania Plaza, Suite 4905 New York, NY 10119

Direct: (267) 857-0849

Email: ian@dereksmithlaw.com

Attorneys for Plaintiff, Petra Christina Beter

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PETRA CHRISTINA BETER,

Plaintiff,

Docket No. 24-cv-00079

v.

DUANE BAUGHMAN, et al.,

Notice of Plaintiff's Motion Seal Plaintiff's Petition to Remove Attorneys Eyes Only Designation from Discovery Documents

Defendants.

To: Jessica N. Meyers
Sheppard Mullin
30 Rockefeller Plaza
New York, NY 10112
JMeyers@sheppardmullin.com
Attorneys for Defendant Baughman

PLEASE TAKE NOTICE that Plaintiff, Petra Christina Beter, by and through her undersigned counsel, moves to place Plaintiff's motion to remove attorney's eyes only designation from discovery documents under seal. A proposed form of order is attached.

Dated: October 10, 2024 New York, New York

/s/ Ian M. Bryson, Esquire
IAN M. BRYSON, ESQUIRE
Attorneys for Petra Beter

IAN M. BRYSON, ESQUIRE 1 Pennsylvania Plaza, Suite 4905 New York, NY 10119

Direct: (267) 857-0849

Email: ian@dereksmithlaw.com

Attorneys for Plaintiff, Petra Christina Beter

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PETRA CHRISTINA BETER,	
Plaintiff,	
v.	Docket No. 24-cv-00079
DUANE BAUGHMAN, et al.,	
Defendants.	

ORDER GRANTING PLAINTIFF'S MOTION TO SEAL PETITION TO REMOVE ATTORNEYS EYES ONLY DESIGNATION FROM DISCOVERY DOCUMENTS

AND NOW, this 11 day of October , 2024, upon consideration of the Plaintiff's Motion to Seal Plaintiff's Petition to Remove Attorneys Eyes Only Designation from Discovery Documents, it is hereby ORDERED that the Motion is **GRANTED**. The Clerk's Office is hereby directed to seal and otherwise make confidential the Plaintiff's Petition to Remove Attorneys Eyes Only Designation from Discovery Documents.

BY THE COURT:

SO ORDERED

ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE

IAN M. BRYSON, ESQUIRE 1 Pennsylvania Plaza, Suite 4905 New York, NY 10119

Direct: (267) 857-0849

Email: ian@dereksmithlaw.com

Attorneys for Plaintiff, Petra Christina Beter

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PETRA CHRISTINA BETER,

Plaintiff.

v.

Docket No. 24-cv-00079

DUANE BAUGHMAN, et al.,

Defendants.

MOTION TO SEAL PETITION TO REMOVE ATTORNEYS EYES ONLY **DESIGNATION FROM DISCOVERY DOCUMENTS**

TO THE HONORABLE JUDGE OF SAID COURT:

- 1. On August 8, 2024, the Court entered an Order granting Plaintiff's motion to compel discovery and ordered Defendant Baughman to "produce documents relating to his dispute with Mr. Stone on an attorneys eyes only basis." See ECF Doc. No. 71.
- 2. Plaintiff now seeks to file a motion to remove the attorneys eyes only designation from certain documents produced pursuant to the Court's August 8, 2024 Order.
- 3. To maintain confidentiality, Plaintiff moves this Honorable Court to direct the Clerk to seal Plaintiff's Motion to remove the attorneys eyes only designation from the aforementioned documents.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant Plaintiff's motion and place the petition under seal when it is filed.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC

/s/ Ian M. Bryson, Esquire IAN M. BRYSON, ESQUIRE 1 Pennsylvania Plaza, Suite 4905 New York, NY 10119 Direct: (267) 857-0849 ian@dereksmithlaw.com Attorneys for Plaintiff

IAN M. BRYSON, ESQUIRE 1 Pennsylvania Plaza, Suite 4905 New York, NY 10119

Direct: (267) 857-0849

Email: ian@dereksmithlaw.com

Attorneys for Plaintiff, Petra Christina Beter

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PETRA CHRISTINA BETER,

Plaintiff,

v.

Docket No. 24-cv-00079

DUANE BAUGHMAN, et al.,

Certificate of Service

Defendants.

I certify that I filed the aforementioned Motion to Seal on ECF which will serve copies of this motion on all counsel of record.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC

/s/ Ian M. Bryson, Esquire
IAN M. BRYSON, ESQUIRE
1 Pennsylvania Plaza, Suite 4905
New York, NY 10119
Direct: (267) 857-0849
ian@dereksmithlaw.com
Attorneys for Plaintiff

Dated: October 10, 2024

FILED UNDER SEAL